

WEINBLATT & GAYLORD PLC

ATTORNEYS & COUNSELORS AT LAW

1616 Pioneer Building
336 North Robert Street
St. Paul, MN 55101
Telephone: (651) 292-8770
Fax: (651) 223-8282
weglaw@usinternet.com



Alan W. Weinblatt
Kathleen A. Gaylord
Maura J. Shuttleworth
Stacie R. McBride-Cox
Eran Kahana

Katharina E. Liston
Jay Benanav
Of Counsel

May 21, 2004

VIA FACSIMILE NO. 202-219-3923 AND UPS

Dominique Dillenseger
Attorney
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: MUR 5321
Janet Robert
Janet Robert for Congress and Teresa Silha, as Treasurer

Ms. Dillenseger:

At our meeting last month pertaining to the above referenced MUR, you asked about the time lag between Ms. Robert's application for additional loans through Southwest Bank of St. Louis, Missouri and the availability of those funds to her, in the event that she desired to loan additional monies to her campaign after September 1, 2002. You are advised that Ms. Robert's banker at Southwest Bank of St. Louis has told her that because she had already set up a line of credit, it would have taken no more than ten working days, at that time, to fund an additional \$500,000 loan to her, to be secured by some of her additional shares in Siegel-Robert, Inc.

In addition, Ms. Robert had two other ways in which to secure additional monies to loan to her campaign. First, she could have caused Siegel-Robert, Inc. to redeem a sufficient number of her shares as she desired, at the pre-determined 2002 per share price. The policy and practice of Siegel-Robert was to redeem shares for its family member shareholders at such pre-determined price upon a request and a telephonic board of directors meeting. Enclosed is the affidavit of Linda Honigfort, Janet Robert's sister and fellow shareholder, confirming that custom and practice. I believe that you also have correspondence from the vice president and treasurer of Siegel-Robert, Inc. also confirming that custom and practice.

Finally, the attached affidavit of Judith Robert, another of Ms. Robert's sisters, confirms that Ms. Robert had made alternative arrangements, as early as May 2002 to sell some of her shares, if need be, to her sister in order to provide additional liquidity to self-finance her congressional campaign.

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
2004 MAY 24 A 11:51

These three backup options were all available to Ms. Robert during 2002. I respectfully submit that this demonstrates that Ms. Robert was not at all dependent upon the unsolicited gift from her mother as a source of funds for her campaign. They should also eliminate any concern about the "timing" of the gift.

Second, you asked me about the "obligation" of Ms. Robert for the advertising "buys" that she intended to make. I have conferred with Martin Hamberger, the campaign's media consultant on this subject. He advises that it is his experience and information that media outlets in general, and radio and television outlets in particular, will not unconditionally guarantee any particular timeslot for a proposed political advertisement. It is also his information and experience that reserving a media slot for a political advertisement will not be honored by a media outlet unless and until the request for reservation time is accompanied by payment in full of the cost of the advertisement. Even in that event, a media buy will not be guaranteed to a political candidate and the reserved time may be sold to any other bidder who offers more money for the time.

Mr. Hamberger further advised me that just after the Labor Day holiday in 2002 he told Janet Robert that it was his opinion that she would need to do an additional media buy to have any reasonable chance of success in her campaign. However, no such buys were, in fact, made or obligated until the money was in fact available to pay for them and no obligation to buy was entered into until that time. If you would like Mr. Hamberger's information in affidavit form, please advise and I will attempt to secure it.

The foregoing is submitted as part of our effort to respond to your questions and to encourage dismissal or mediation of this MUR at the earliest stage in the process.

I await your response. Thank you.



ALAN WEINBLATT
FOR
WEINBLATT & GAYLORD PLC

AWW:kq
Enclosures
cc: Janet Robert

FEDERAL ELECTION COMMISSION

MUR 5321

STATE OF MISSOURI)
)ss.
COUNTY OF ST. LOUIS)

AFFIDAVIT OF LINDA HONIGFORT

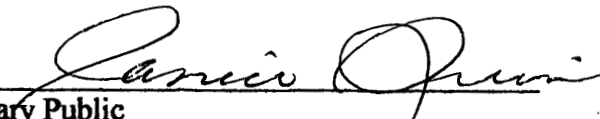
Linda Honigfort, first being duly sworn, deposes and says:

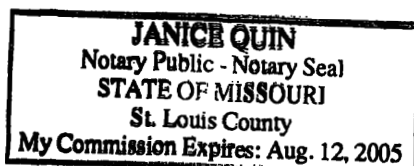
1. I am a sister of Janet Robert and make this affidavit of my own knowledge.
2. In late April or early May of 2002 I had a phone conversation with my sister Janet Robert during which she asked me if I would be willing to purchase certain of her shares in Siegel-Robert, Inc. at a per share price that had been set earlier in the year by the company.
3. During that conversation, I told Janet that I would be willing to purchase \$400,000 worth of her shares. To that end, I set aside enough money to make that level of purchase if Janet asked me to do so.
4. I am a member of the Siegel-Robert, Inc. Board of Directors and am aware that the Board can, and in fact on one occasion has, approved share redemptions from a shareholder on short notice in a telephone conference meeting rather than an in-person meeting. The Board did so act upon a similar request from another shareholder in July 2002.
5. Further Affiant sayeth not.


LINDA HONIGFORT

Subscribed and sworn to before me, a

Notary Public, this 13th day of May, 2004.


Notary Public



FEDERAL ELECTION COMMISSION

MUR 5321

STATE OF INDIANA)
)ss.
COUNTY OF ST. JOSEPH)

AFFIDAVIT OF JUDITH ROBERT

Judith Robert, first being duly sworn, deposes and says:

1. I am a sister of Janet Robert and make this affidavit of my own knowledge.
2. In late April or early May of 2002 I had a phone conversation with my sister Janet Robert during which she asked me if I would be willing to purchase certain of her shares in Siegel-Robert, Inc. at a per share price set annually by the company.
3. During that conversation, I told Janet that I would be willing to purchase \$400,000 worth of her shares. To that end, I set aside enough money to make that level of purchase if Janet asked me to do so.
4. In February of 2003, I called Janet on the telephone and reminded her of my prior agreement to set aside money to purchase some of her stock if she requested. I then asked her if she needed me to continue to set aside this money, as I was making plans to undertake a major home renovation and wanted to make sure I had enough set aside for our agreement. She asked me to continue holding the money aside for now. I have contemporaneous notes documenting this conversation.
5. Further Affiant sayeth not.


JUDITH ROBERT

Subscribed and sworn to before me, a

Notary Public, this 14 day of May, 2004.


Notary Public

MELINDA A LAWECKI
NOTARY PUBLIC STATE OF INDIANA
ST. JOSEPH COUNTY
MY COMMISSION EXP. APR. 22, 2009